

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 17 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MAUREEN WOODSON, and
DONNA THOMPSON,

Defendants.

No.

4:22-CR-00461-RWS/SPM

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1 - 2
WIRE FRAUD

A. INTRODUCTION

At all times relevant to the Indictment:

1. Flordell Hills is a city located in St. Louis County, Missouri. According to the U.S. Census Bureau 2016-2020 Survey, there were approximately 1,188 people living in Flordell Hills, Missouri, with approximately 53.9% of its residents living below the poverty line. The City's annual operating budget was approximately \$450,000.

2. The defendant, **MAUREEN WOODSON**, (hereinafter referred to as "**WOODSON**"), was the City Clerk of Flordell Hills, Missouri, having been hired on or about January 20, 2010. In her position, **WOODSON** was responsible for collecting and receipting all monies received by the city, paying the bills for the city, and she had full access to the city's bank accounts. **WOODSON** was authorized to sign checks on the city's bank accounts, and she received and reconciled the monthly bank statements on those accounts. She was also responsible for posting the city's financial transactions to its computerized accounting system through QuickBooks.

3. The defendant, **DONNA THOMPSON**, (hereinafter referred to as “**THOMPSON**”), was the Assistant City Clerk of Flordell Hills, Missouri, having been hired on or about April 13, 2012. In her position, **THOMPSON** worked under the direction of co-defendant **WOODSON** and assisted **WOODSON** in performing her duties.

4. The bank accounts of Flordell Hills were held at Great Southern Bank, and each check written on the City’s bank accounts required two authorized signatures. **WOODSON**, along with the City’s Mayor and the City’s Treasurer were authorized to sign checks issued from the City’s bank accounts, thus two of their three signatures was required on each check.

5. Defendants, **WOODSON** and **THOMPSON** shared a residence together, on Harness Drive in Florissant, Missouri.

B. SCHEME TO DEFRAUD

6. Beginning in or about February, 2016 and continuing through in or about April, 2022, both dates being approximate and inclusive, in the Eastern District of Missouri and elsewhere, the defendants,

MAUREEN WOODSON, and

DONNA THOMPSON,

acting together and aiding and abetting each other, devised, intended to devise, and knowingly participated in a scheme to defraud and obtain money from Flordell Hills, Missouri, in an approximate amount of \$663,604.88, by means of materially false and fraudulent pretenses, representations, and promises.

7. As a part of their scheme, defendants **WOODSON** and **THOMPSON** issued approximately 614 Flordell Hills checks to themselves, in the total amount of approximately \$531,355.79, without the authority and knowledge of Flordell Hills and its Mayor, Treasurer, or Board of Aldermen. **WOODSON** and **THOMPSON** cashed one and more of these checks, and

also deposited one and more of these checks into their own personal bank accounts. Approximately 368 of those checks, in the total amount of \$376,026.71, were issued to **WOODSON**, and approximately 246 of those checks, in the total amount of \$155,329.08, were issued to **THOMPSON**.

8. As a further part of their scheme, the purported signatures of the City's Mayor and/or the City's Treasurer on those unauthorized checks were forged by one or both of the defendants. Defendants then used those unauthorized funds for their own personal use, unrelated to the legitimate business and operations of Flordell Hills, including for the payment of personal expenses and for gambling at area casinos and online.

9. As a further part of their fraudulent scheme, on approximately 381 occasions, **WOODSON AND THOMPSON** used Flordell Hills bank funds to directly pay for their own personal expenses. Flordell Hills funds used to pay for personal expenses totaled approximately \$132,249.09, and were for such personal expenses as retail vendor charges, entertainment, restaurants, home rental payments, and personal taxes owed to the Internal Revenue Service. These payments for their personal expenses were made either by **WOODSON's** and **THOMPSON's** issuance of Flordell Hills bank checks to third party vendors, or by their wire transfer of Flordell Hills bank funds to third party vendors. None of these personal expenses which were paid for with Flordell Hills funds were authorized by Flordell Hills, its Mayor, its Treasurer or its Board of Aldermen, and they were not for the legitimate business or operations of Flordell Hills.

C. THE WIRES

COUNT 1

10. On or about January 11, 2019, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain

money and property by means of false and fraudulent pretenses, and representations, the defendants,

MAUREEN WOODSON, and

DONNA THOMPSON,

acting together and aiding and abetting one another, did knowingly transmit and cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, and signals, including a payment for defendant **WOODSON's** personal Amazon Prime Store Card in the amount of \$1,009.24, which funds originated from Flordell Hills' Great Southern Bank account, located in Springfield, Missouri, and which funds were transmitted via the internet to one of Synchrony Bank/Amazon's payment processing centers located in Arizona or Texas.

In violation of Title 18, United States Code, Sections 2 and 1343.

COUNT 2

11. On or about September 13, 2021, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, and representations, the defendants,

MAUREEN WOODSON, and

DONNA THOMPSON,

acting together and aiding and abetting one another, did knowingly transmit and cause to be transmitted by means of wire communication in and affecting interstate commerce, certain writings, signs, and signals, including a payment for defendant **THOMPSON's** personal Roaman's credit card in the amount of \$272.59, which funds originated from Flordell Hills' Great Southern Bank account, located in Springfield, Missouri, and which funds were transmitted via

the internet to one of Comenity Bank/Roaman's payment processing centers located in Columbus, Ohio or Carlstadt, Texas.

In violation of Title 18, United States Code, Sections 2 and 1343.

COUNTS 3 - 4
MAIL FRAUD

12. Paragraphs 1 – 9 of this Indictment are fully incorporated by reference herein as if fully restated.

COUNT 3

13. On or about August 7, 2020, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, the defendants,

MAUREEN WOODSON, and

DONNA THOMPSON,

acting together and aiding and abetting one another, knowingly mailed, or caused to be mailed, a Flordell Hills bank check in the amount of \$865.56, which funds had been withdrawn by defendants from the Flordell Hills' Great Southern Bank account, from St. Louis, Missouri to GM Financial, located in Arlington, Texas. The check was a payment on defendant **MAUREEN WOODSON's** personal automobile loan.

In violation of Title 18, United States Code, Sections 2 and 1341.

COUNT 4

14. On or about December 9, 2021, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, the defendants,

MAUREEN WOODSON, and

DONNA THOMPSON,

acting together and aiding and abetting one another, knowingly mailed, or caused to be mailed, a Flordell Hills bank check in the amount of \$976.50, which funds had been withdrawn by defendants from the Flordell Hills' Great Southern Bank account, from St. Louis, Missouri to the payment processing center of Geico Insurance, located in Philadelphia, Pennsylvania. The check was a payment on defendant **DONNA THOMPSON's** personal automobile insurance policy.

In violation of Title 18, United States Code, Sections 2 and 1341.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1343 as set forth in Counts 1 and 2, and of Title 18, United States Code, Section 1341, as set forth in Counts 3 and 4, the defendants shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation, which is at least \$663,604.88.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

HAL GOLDSMITH, #32984MO
Assistant United States Attorney